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District of Hawaii

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

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UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

| | | |
|-----------------------------------|---------|----------------------|
| UNITED STATES OF AMERICA, |) | CR. NO. 00-00182 SOM |
| |) | |
| Plaintiff, |) | SECOND SUPERSEDING |
| |) | INDICTMENT |
| v. |) | |
| FELIPE RUIZ-CASTRO, | (01),) | [21 U.S.C. §§ |
| FRANCISCO SERVIN-SOTO, | (03),) | 841(a)(1), 843(b), |
| aka "Pancho," |) | 846, 848(a), 853; |
| JESSICA GUZMAN-SOTO, | (04),) | 18 U.S.C. §§ |
| MANUEL JAVIER RODRIGUES-MARTINEZ, | (05),) | 1956(a)(1)(B)(I), |
| aka "Javier," |) | 2, 1956(h)] |
| JOSE LUIS VASQUEZ, | (06),) | |
| RANDALL RAMELB, | (07),) | |
| aka "Randy," |) | |
| MARTIN MORA-GARCIA, | (08),) | |
| aka "Martin Arreaga," |) | |
| aka "El Burro," |) | |
| aka "Manny," |) | |
| MIGUEL ANGEL RUIZ, | (10),) | |
| aka "El Padre," |) | |
| Defendants. |) | |

SECOND SUPERSEDING INDICTMENT

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COUNT 1

The Grand Jury charges that:

From on or about a date unknown, but from at least May 1, 1999, to on or about May 3, 2000, in the District of Hawaii and elsewhere, FELIPE RUIZ-CASTRO, defendant herein, unlawfully, knowingly and intentionally did engage in a continuing criminal enterprise in that he did violate Title 21, United States Code, Section 841(a)(1), 843(b) and 846, which violations were part of a continuing series of violations of said statutes undertaken by said defendant in concert with at least five other persons, with respect to whom the defendant occupied a position of organizer, supervisor, and manager, and from which continuing series of violations that defendant obtained substantial income and resources.

All in violation of Title 21, United States Code, Section 848(a).

COUNT 2

The Grand Jury further charges that:

From a date unknown, but from at least on or about May 1, 1999 to on or about May 3, 2000, in the District of Hawaii and elsewhere, the defendants FELIPE RUIZ-CASTRO, MANUEL JAVIER RODRIGUES-MARTINEZ, aka "Javier," FRANCISCO SERVIN-SOTO, aka "Pancho," JESSICA GUZMAN-SOTO, JOSE LUIS VASQUEZ RANDALL RAMELB, aka "Randy," and MARTIN MORA-GARCIA, aka "Martin Arreaga," aka "El Burro," aka "Manny," did conspire together with each other and with Francisco Mora-Garcia, aka "Pancho," Jorge Casas, aka

"Jorge Cano," aka "George," Leah Cardenas, Basilia Salamanca, Jesus Martin Reyes Mojardin, aka "The Man," Raquel Salazar Salazar, aka "Don Alberto," aka "Don Roberto," Jose Angel Lemon-Pena, aka "Valerio," aka "Koki," Fermin Pena, Sabino Albarran, aka "Pelon," Antonio Mora-Garcia, aka "Tono," Pablo Romero, aka "Pablo Gilberto Romero-Flores," aka "Sonny," Adrian Barahona, aka "Cuevas," aka "Covachas," Thomas Marino, Sr., Ana Marino, Tomas Marino, Jr., Mona Hiiaca Huihui aka "Jiaca," Karla Kahau, Miguel Gaytan Perez, aka "Pato," Juan Hernandez, aka "Juan Luis," aka "Piolas," Isidro Lnu, aka "Michael Reyes," Victor Navarez, Joaquin Aguilar, aka "Negro," aka "Cacharpas," Brian Paschoal, Pedro Jiminez, Fernando Rios, Laurie Horswill-Smith, aka "Mola," Pualani Horswill, aka "Pua," Wendy Bettis, Romeo Antonio Castro-Avalos, aka "Antonio Perez," aka "Tony," aka "Salvadoran," Ismael Rocha-Manzanarez, aka "Ivan Leyva-Mansares," aka "Mayelo," Fermin Rivera, Alma Rosie Rodriguez, aka "Rosie," Raul LNU, Hipolito LNU, aka "Poli," Alvaro LNU, aka "Guero," Carlos Guerrero, aka "Pepechin," Casey Smythe, aka "K.C.," Jose Acevedo-Gasca, Gustavo Sanchez, Tracy Garcia Sanchez, Brian Joshua Jones, aka "El Tigre," Leroy Mollena, Arturo Flores, aka "El Bomba," Enrique Reyes, aka "Toribio," Guillermo Alvarez, aka "Willie," Leopoldo Castro-Lopez, aka "Polo," Salvador Castillo, aka "Chava," Holmar Hernandez, aka "Omar," Armando Montano Rodriguez, aka "Camote," aka "Teco," Robert Mahoney, Carlos Reyes-Castro, aka "Sergio," aka "Carlos," Eduardo Velasco, aka "Carlos Perez-Garcia," Cheryl Yates, not defendants herein, and with other persons unknown to

the Grand Jury, to commit offenses against the United States, that is, to knowingly and intentionally distribute and possess with intent to distribute cocaine, a Schedule II controlled substance, to distribute and possess with intent to distribute heroin, a Schedule I controlled substance, to distribute and possess with intent to distribute crystal methamphetamine - "ice," a Schedule II controlled substance, and to distribute and possess with intent to distribute marijuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

Ways and Means of Accomplishing the Conspiracy

1) The Ruiz-Mora drug distribution organization consisted of a group of individuals who obtained cocaine, heroin, crystal methamphetamine - "ice," and marijuana from the West Coast of the U.S. mainland, from Mexico and from Hawaii for distribution in Hawaii, and who distributed cocaine, heroin, crystal methamphetamine - "ice," and marijuana in Hawaii.

2) FRANCISCO SERVIN-SOTO, aka "Pancho," JESSICA GUZMAN-SOTO, Jesus Martin Reyes Mojardin, aka "The Man," Raquel Salazar Salazar, aka "Don Alberto," aka "Don Roberto," Jorge Casas, aka "Jorge Cano," aka "George," Leah Cardenas, Fermin Pena and Fermin Rivera supplied cocaine and heroin to the co-conspirators named in this Indictment.

3) Jorge Casas, aka "Jorge Cano," aka "George," Jose Angel Lemon-Pena, aka "Valerio," aka "Koki," Fermin Pena, and

Leopoldo Castro-Lopez, aka "Polo," supplied crystal methamphetamine - "ice" to the co-conspirators named in the indictment.

a) Brian Paschoal and Victor Navarez supplied marijuana to the co-conspirators named in the indictment.

4) Various co-conspirators, acting as drug couriers, traveled between Hawaii and the West Coast of the United States and Mexico (a) to obtain and deliver cocaine and heroin supplied by FRANCISCO SERVIN-SOTO, aka "Pancho," JESSICA GUZMAN-SOTO, Jesus Martin Reyes Mojardin, aka "The Man," Raquel Salazar Salazar, aka "Don Alberto," aka "Don Roberto," Jorge Casas, aka "Jorge Cano," aka "George," Leah Cardenas, Jose Angel Lemon-Pena, aka "Valerio," aka "Koki," Fermin Pena, Fermin Rivera, and others to the Ruiz-Mora drug distribution organization, and (b) to deliver United States currency to FRANCISCO SERVIN-SOTO, aka "Pancho," JESSICA GUZMAN-SOTO, Jesus Martin Reyes Mojardin, aka "The Man," Raquel Salazar Salazar, aka "Don Alberto," aka "Don Roberto," Jorge Casas, aka "Jorge Cano," aka "George," Leah Cardenas, Jose Angel Lemon-Pena, aka "Valerio," aka "Koki," Fermin Pena, Fermin Rivera and others in payment for the cocaine and marijuana.

5) Mona Hiiaca Huihui, aka "Jiaca," Karla Kahau, and Adrian Barahona, aka "Cuevas," aka "Covachas," traveled from Hawaii to the West Coast of the United States and Mexico for the purpose of obtaining cocaine and methamphetamine for distribution in Hawaii.

6) Brian Joshua Jones, aka "El Tigre," and Eduardo Velasco, aka "Carlos Perez-Garcia," traveled from the West Coast of the United States to Hawaii to supply the Ruiz-Mora organization with cocaine, and crystal methamphetamine - "ice."

7) Co-conspirators Marcia Solano and Miriam Espinosa traveled from the West Coast of the United States to Hawaii for the purpose of delivering cocaine to Hawaii and carrying U.S. currency back to the West Coast of the United States.

8) In this way, FRANCISCO SERVIN-SOTO, aka "Pancho," JESSICA GUZMAN-SOTO, Jesus Martin Reyes Mojardin, aka "The Man," Raquel Salazar Salazar, aka "Don Alberto," aka "Don Roberto," Jorge Casas, aka "Jorge Cano," aka "George," Leah Cardenas, Fermin Pena, Jose Angel Lemon-Pena, aka "Valerio," aka "Koki," and Fermin Rivera during the existence of the conspiracy, supplied and attempted to supply the Ruiz-Mora drug distribution organization with kilogram quantities of cocaine, ounces of heroin and pound quantities of crystal methamphetamine - "ice," for distribution in Hawaii.

9) Once cocaine, heroin, crystal methamphetamine - "ice," and marijuana, supplied by FRANCISCO SERVIN-SOTO, aka "Pancho," JESSICA GUZMAN-SOTO, Jose Angel Lemon-Pena, aka "Valerio," aka "Koki," Jorge Casas, aka "Jorge Cano," aka "George," Leah Cardenas, Fermin Rivera and Fermin Pena, arrived in Hawaii, various members of the Ruiz-Mora drug distribution organization repackaged the quantities of cocaine, heroin, crystal methamphetamine - "ice," and marijuana into smaller

quantities for distribution and distributed quantities of that cocaine, heroin, crystal methamphetamine - "ice," and marijuana in Hawaii to purchasers, usually in ounce and gram quantities.

10) FELIPE RUIZ-CASTRO and Francisco Mora-Garcia, aka "Pancho," used La Fogata Mexican Restaurant in Lahaina to store cocaine, heroin, crystal methamphetamine - "ice," and marijuana.

11) The co-conspirators distributed cocaine, heroin, crystal methamphetamine - "ice," and marijuana on Maui, Oahu, and the Island of Hawaii for cash.

12) The co-conspirators concealed the income and assets derived from the sale of controlled substances through the use of wire transfers of U.S. currency.

13) The co-conspirators used long distance telephone calls, telephone pagers and cellular telephones to arrange for the distribution of cocaine, heroin, crystal methamphetamine - "ice," and marijuana.

Overt Acts

In furtherance of and in order to accomplish the objects of this conspiracy, the defendants and their co-conspirators performed overt acts in the District of Hawaii and elsewhere, including but not limited to the following:

1. On or about May 19, 1999, defendant MANUEL JAVIER RODRIGUES-MARTINEZ, aka "Javier," distributed a quantity of heroin in Lahaina, Maui for \$2,800.

2. On or about August 30, 1999, defendant FELIPE RUIZ-CASTRO distributed a quantity of cocaine in Lahaina, Maui for \$1,000.

3. On or about November 30, 1999, defendant FELIPE RUIZ-CASTRO distributed a quantity of cocaine in Lahaina, Maui for \$3,000.

4. On or about December 10, 1999, defendant FRANCISCO SERVIN-SOTO, aka "Pancho," telephoned Marcia Solano and discussed a trip to Hawaii.

5. On or about December 13, 1999, defendant FRANCISCO SERVIN-SOTO, aka "Pancho," telephoned Basilia Salamanca and discussed the transportation of a quantity of cocaine from California to Hawaii by two women couriers.

6. On or about December 14, 1999, defendant FRANCISCO SERVIN-SOTO, aka "Pancho," made a long distance telephone call from Pomona, California to defendant FELIPE RUIZ-CASTRO in Lahaina, Maui, Hawaii and discussed the purchase of airline tickets.

7. On or about December 14, 1999, defendant JESSICA GUZMAN-SOTO called Marcia Solano, not a defendant herein, and discussed carrying a quantity of cocaine from California to Hawaii.

8. On or about December 15, 1999, defendant FRANCISCO SERVIN-SOTO, aka "Pancho," drove Marcia Solano and Miriam Espinosa, not defendants herein, to Los Angeles International Airport.

9. On or about December 15, 1999, Marcia Solano and Miriam Espinosa, not defendants herein, transported approximately two pounds of cocaine on board a United Airlines flight to Kahului, Maui.

10. On or about December 16, 1999, Basilia Salamanca telephoned defendant FRANCISCO SERVIN-SOTO, aka "Pancho," and discussed the arrest of Marcia Solano and Miriam Espinosa by the police on Maui, Hawaii.

11. On or about December 22, 1999, defendant FELIPE RUIZ-CASTRO telephoned defendant FRANCISCO SERVIN-SOTO, aka "Pancho," and discussed the arrest of Marcia Solano by the police in Maui, Hawaii.

12. On or about December 27, 1999, Raquel Salazar Salazar, aka "Don Alberto," aka "Don Roberto," telephoned defendant FRANCISCO SERVIN-SOTO, aka "Pancho," and discussed the arrest of Marcia Solano and Miriam Espinosa in Hawaii and the payment of monies owed for the cocaine provided to defendant FRANCISCO SERVIN-SOTO and transported to Maui, Hawaii by Marcia Solano and Miriam Espinosa.

13. On or about December 29, 1999, Raquel Salazar Salazar, aka "Don Alberto," aka "Don Roberto," telephoned defendant FRANCISCO SERVIN-SOTO, aka "Pancho," and discussed taking precautions to avoid apprehension by the police.

14. On or about January 9, 2000, Raquel Salazar Salazar, aka "Don Alberto," aka "Don Roberto," telephoned defendant FRANCISCO SERVIN-SOTO, aka "Pancho," and discussed the

payment of monies owed for the cocaine transported to Maui, Hawaii by Solano and Espinosa.

15. On or about January 13, 2000, Jesus Martin Reyes Mojardin, aka "The Man," telephoned defendant FRANCISCO SERVIN-SOTO, aka "Pancho," and discussed the payment of monies owed by defendant FRANCISCO SERVIN-SOTO, aka "Pancho," for the cocaine transported to Maui, Hawaii by Solano and Espinosa.

16. On or about January 18, 2000, Jesus Martin Reyes Mojardin, aka "The Man," telephoned defendant JESSICA GUZMAN-SOTO and discussed the payment of monies owed by defendant FRANCISCO SERVIN-SOTO, aka "Pancho," for the cocaine transported to Maui, Hawaii by Solano and Espinosa.

17. On or about January 19, 2000, Jesus Martin Reyes Mojardin, aka "The Man," telephoned defendant JESSICA GUZMAN-SOTO and discussed the payment of monies owed by defendant FRANCISCO SERVIN-SOTO, aka "Pancho," for the cocaine transported to Maui, Hawaii by Solano and Espinosa.

18. On or about January 25, 2000, Jesus Martin Reyes Mojardin, aka "The Man," telephoned defendant JESSICA GUZMAN-SOTO and discussed the payment of monies owed by defendant FRANCISCO SERVIN-SOTO, aka "Pancho," for the cocaine transported to Maui, Hawaii by Solano and Espinosa.

19. On or about January 25, 2000, defendant FRANCISCO SERVIN-SOTO, aka "Pancho," telephoned defendant JESSICA GUZMAN-SOTO and discussed the payment of monies to Jesus Martin

Reyes Mojardin, aka "The Man," for the cocaine transported to Maui, Hawaii.

20. On or about February 9, 2000, Armando Montano Rodriguez, aka "Camote," aka "Teco," arranged a wire transfer of \$2,000 to Mexico.

21. On or about February 10, 2000, Jorge Casas, aka "Jorge Cano," aka "George," telephoned defendant FELIPE RUIZ-CASTRO and discussed the transfer of a sum of money from Hawaii to California.

22. On or about February 10, 2000, defendant FELIPE RUIZ-CASTRO instructed Sabino Albarran, aka "Pelon," to tell Adrian Barahona, aka "Cuevas," aka "Covachas," to prepare to travel to California.

23. On or about February 10, 2000, Adrian Barahona, aka "Cuevas," aka "Covachas," traveled to California carrying a large quantity of cash.

24. On or about February 11, 2000, defendant FELIPE RUIZ-CASTRO telephoned Jorge Casas, aka "Jorge Cano," aka "George," and discussed the transport of a sum of money to California by an associate.

25. On or about February 11, 2000, defendant FELIPE RUIZ-CASTRO telephoned Thomas Marino, Sr. and discussed the sale of a quantity of drugs.

26. On or about February 11, 2000, defendant FELIPE RUIZ-CASTRO telephoned Ana Marino and discussed the sale of a quantity of drugs.

27. On or about February 11, 2000, Francisco Mora-Garcia, aka "Pancho," telephoned defendant FELIPE RUIZ-CASTRO and discussed the transfer of a sum of money to California.

28. On or about February 14, 2000, Brian Joshua Jones, aka "El Tigre," traveled to Maui.

29. On or about February 15, 2000, Jose Angel Lemon-Pena, aka "Valerio," aka "Koki," called defendant FELIPE RUIZ-CASTRO on the telephone.

30. On or about February 24, 2000, Armando Montano Rodriguez, aka "Camote," aka "Teco," called defendant FELIPE RUIZ-CASTRO on the telephone.

31. On or about February 24, 2000, Jose Angel Lemon-Pena, aka "Valerio," aka "Koki," called defendant FELIPE RUIZ-CASTRO on the telephone.

32. On or about February 24, 2000, Sabino Albarran, aka "Pelon," distributed approximately eight ounces of cocaine.

33. On or about February 28, 2000, Pedro Jiminez and Fernando Rios transported approximately one ounce of crystal methamphetamine - "ice," and \$25,000 in U.S. currency to Phoenix, Arizona.

34. On or about February 29, 2000, Adrian Barahona, aka "Cuevas," aka "Covachas," transported approximately 50 grams of crystal methamphetamine - "ice," to Kona, Hawaii from Maui.

35. On or about March 7, 2000, the defendant RANDALL RAMELB spoke to defendant FELIPE RUIZ-CASTRO on the telephone.

36. On or about March 22, 2000, Mona Hiiaca Huihui, aka "Jiaca," and Karla Kahau traveled to Las Vegas, Nevada to obtain a quantity of crystal methamphetamine - "ice."

37. On or about March 30, 2000, Mona Hiiaca Huihui, aka "Jiaca," and Karla Kahau carried approximately two pounds of crystal methamphetamine - "ice," through the Las Vegas, Nevada airport.

38. On or about April 5, 2000, defendant JOSE LUIS VASQUEZ spoke to defendant FELIPE RUIZ-CASTRO on the telephone.

39. On or about April 16, 2000, Brian Joshua Jones, aka "El Tigre," transported approximately six kilograms of cocaine from California to Honolulu, Hawaii.

40. On or about April 27, 2000, Eduardo Velasco, aka "Carlos Perez-Garcia," transported approximately 140 grams of crystal methamphetamine - "ice," from California to Kahului, Maui.

41. On or about May 4, 2000, defendant RANDALL RAMELB stored crystal methamphetamine - "ice," cocaine and marijuana for distribution at his residence.

All in violation of Title 21, United States Code, Section 846.

COUNT 3

The Grand Jury further charges that:

A. In committing the offense alleged in Count 2 of the Second Superseding Indictment, defendant FELIPE RUIZ-CASTRO used, or intended to be used, in any manner or part, the following real and personal property, to commit, or to facilitate the commission of said offense:

1. All of that certain parcel of land being described as Apartment No. A-201, comprising a portion of the Hale Royale Condominium Project as described in and established by Declaration of Horizontal Property Regime dated October 8, 1979, recorded in the Bureau of Conveyances of the State of Hawaii in Book 14384 at Page 38, as the same may have been amended from time to time as shown on the plans of the Project recorded in said Bureau as Condominium File Plan No. 679, as the same may have been amended from time to time, situated between Lower Honoapiilani Road and Honopiilani Highway, being at Mahinahina, Kaanapali, Lahaina, Maui, Hawaii as Tax Map Key Number 4-03-006-005, CPR 15, at 3788 Honoapiilani Road, and all appurtenances and improvements thereto;

2. One 1999 Toyota 4-Runner Pickup, Vehicle Identification Number JT3GN86R5X0103236, License Number MEX631;

3. One 1996 Honda Accord Sedan, Vehicle Identification Number 1HGCD5538TA052462, License Number MBP069;

B. Furthermore, any and all property constituting or derived from any proceeds the defendant obtained, directly or indirectly, as a result of the offenses.

C. Furthermore, any and all property located within the United States, and any property not specifically named herein which was used, or intended to be used, to commit or to facilitate the commission of said offenses, and any property

constituting or derived from any proceeds obtained directly or indirectly as a result of the offenses.

If any of the above-described forfeitable property, as a result of any act or omission of the defendant -

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty;

It is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

By virtue of the commission by said defendant of the said offense charged in the Indictment, said defendant shall forfeit any and all interest he has in the aforesaid properties pursuant to Title 21, United States Code, Section 853.

All in violation of Title 21, United States Code, Section 853.

COUNT 4

The Grand Jury further charges that:

On or about May 19, 1999, in the District of Hawaii, defendants MANUEL JAVIER RODRIGUES-MARTINEZ, aka "Javier," and FELIPE RUIZ-CASTRO, each aiding and abetting the other, did knowingly and intentionally distribute a quantity of heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT 5

The Grand Jury further charges that:

On or about November 30, 1999, in the District of Hawaii, defendant FELIPE RUIZ-CASTRO did knowingly and intentionally distribute approximately three ounces of cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT 6

The Grand Jury further charges that:

On or about December 17, 1999, in the District of Hawaii and elsewhere, the defendants FELIPE RUIZ-CASTRO, FRANCISCO SERVIN-SOTO, aka "Pancho," JESSICA GUZMAN-SOTO,, together with Jesus Martin Reyes Mojardin, aka "The Man," Raquel Salazar Salazar, aka "Don Alberto," aka "Don Roberto," Basilia Salamanca, Marcia Solano and Miriam Espinosa, not defendants herein, did knowingly and intentionally aid and abet each other

in the possession with intent to distribute a quantity of cocaine, in excess of 500 grams, that is, approximately one (1) kilogram of cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT 7

The Grand Jury further charges that:

On or about February 9, 2000, in the District of Hawaii, the defendant FELIPE RUIZ-CASTRO and Pablo Romero, aka "Sonny," and used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute heroin, cocaine, crystal methamphetamine - "ice, and marijuana, all controlled substances, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 8

The Grand Jury further charges that:

On or about February 10, 2000, in the District of Hawaii, defendant FELIPE RUIZ-CASTRO and Jorge Casas, aka "Jorge Cano," aka "George," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a possession with intent to distribute a quantity of crystal methamphetamine - "ice," a Schedule II controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 9

The Grand Jury further charges that:

On or about February 11, 2000, in the District of Hawaii, defendant FELIPE RUIZ-CASTRO and Thomas Marino, Sr. used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a possession with intent to distribute a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 10

The Grand Jury further charges that:

On or about February 11, 2000, in the District of Hawaii, defendant FELIPE RUIZ-CASTRO and Francisco Mora-Garcia, aka "Pancho," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute a quantity of cocaine, heroin, crystal methamphetamine - "ice," and marijuana, all controlled substances, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 11

The Grand Jury further charges that:

On or about February 11, 2000, in the District of Hawaii, defendant FELIPE RUIZ-CASTRO and Ana Marino used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a possession with intent to distribute a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 12

The Grand Jury further charges that:

On or about February 11, 2000, in the District of Hawaii, the defendant FELIPE RUIZ-CASTRO and Arturo Flores, aka "El Bomba," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute a quantity of cocaine, a Schedule II controlled substance, and heroin, a Schedule I controlled substance, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 13

The Grand Jury further charges that:

On or about February 12, 2000, in the District of Hawaii, defendant FELIPE RUIZ-CASTRO and Joaquin Aguilar, aka "Negro," aka "Cacharpas," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a distribution of a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 14

The Grand Jury further charges that:

On or about February 12, 2000, in the District of Hawaii, defendant FELIPE RUIZ-CASTRO and Joaquin Aguilar, aka "Negro," aka "Cacharpas," knowingly and intentionally possessed with intent to distribute a quantity of cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT 15

The Grand Jury further charges that:

On or about February 12, 2000, in the District of Hawaii, the defendant FELIPE RUIZ-CASTRO and Enrique Reyes, aka "Toribio," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission

of a conspiracy to distribute a quantity of cocaine and crystal methamphetamine - "ice," Schedule II controlled substances, and heroin, a Schedule I controlled substance, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 16

The Grand Jury further charges that:

On or about February 15, 2000, in the District of Hawaii, defendant FELIPE RUIZ-CASTRO and Laurie Horswill-Smith, aka "Mola," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a distribution of a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 17

The Grand Jury further charges that:

On or about February 15, 2000, in the District of Hawaii, defendant FELIPE RUIZ-CASTRO and Romeo Antonio Castro-Avalos, aka "Antonio Perez," aka "Tony," aka "Salvadoran," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute a quantity of cocaine, heroin, crystal methamphetamine - "ice," and marijuana, all controlled

substances, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 18

The Grand Jury further charges that:

On or about February 15, 2000, in the District of Hawaii and elsewhere, defendant FELIPE RUIZ-CASTRO and Jose Angel Lemon-Pena, aka "Valerio," aka "Koki," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute a quantity of cocaine, heroin, crystal methamphetamine - "ice," and marijuana, all controlled substances, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 19

The Grand Jury further charges that:

On or about February 16, 2000, in the District of Hawaii, defendant FELIPE RUIZ-CASTRO and Joaquin Aguilar, aka "Negro," aka "Cacharpas," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a distribution of a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 20

The Grand Jury further charges that:

On or about February 16, 2000, in the District of Hawaii, defendant FELIPE RUIZ-CASTRO and Joaquin Aguilar, aka "Negro," aka "Cacharpas," knowingly and intentionally possessed with intent to distribute a quantity of cocaine.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT 21

The Grand Jury further charges that:

On or about February 16, 2000, in the District of Hawaii, the defendant FELIPE RUIZ-CASTRO and Casey Smythe, aka "K.C.," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute a quantity of cocaine, a Schedule II controlled substance, and heroin, a Schedule I controlled substance, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 22

The Grand Jury further charges that:

On or about February 16, 2000, in the District of Hawaii, Jorge Casas, aka "Jorge Cano," aka "George," and

defendant FELIPE RUIZ-CASTRO used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a distribution of a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 23

The Grand Jury further charges that:

On or about February 17, 2000, in the District of Hawaii, the defendant FELIPE RUIZ-CASTRO and Francisco Mora-Garcia, aka "Pancho," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 24

The Grand Jury further charges that:

On or about February 17, 2000, in the District of Hawaii, the defendant FELIPE RUIZ-CASTRO and Hipolito LNU, aka "Poli," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute a quantity of cocaine, a Schedule

II controlled substance, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 25

The Grand Jury further charges that:

On or about February 17, 2000, in the District of Hawaii, the defendant FELIPE RUIZ-CASTRO and Fermin Rivera, used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute a quantity of marijuana, a Schedule I controlled substance, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 26

The Grand Jury further charges that:

On or about February 18, 2000, in the District of Hawaii, the defendant FELIPE RUIZ-CASTRO and Ismael Rocha-Manzanarez, aka "Ivan Leyva-Mansares," aka "Mayelo," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute a quantity of cocaine, a Schedule II controlled substance, and heroin, a Schedule I controlled substance, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 27

The Grand Jury further charges that:

On or about February 18, 2000, in the District of Hawaii, the defendant FELIPE RUIZ-CASTRO and Enrique Reyes, aka "Toribio," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute a quantity of cocaine, heroin, crystal methamphetamine - "ice," and marijuana, all controlled substances, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 28

The Grand Jury further charges that:

On or about February 20, 2000, in the District of Hawaii, defendant FELIPE RUIZ-CASTRO and Joaquin Aguilar, aka "Negro," aka "Cacharpas," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a possession with intent to distribute a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 29

The Grand Jury further charges that:

On or about February 20, 2000, in the District of Hawaii, the defendant FELIPE RUIZ-CASTRO and Juan Hernandez, aka "Juan Luis," aka "Piolas," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute a quantity of cocaine, heroin, crystal methamphetamine - "ice," and marijuana, all controlled substances, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 30

The Grand Jury further charges that:

On or about February 23, 2000, in the District of Hawaii, MARTIN MORA-GARCIA, aka "Martin Arreaga," aka "El Burro," aka "Manny," and defendant FELIPE RUIZ-CASTRO used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute cocaine, heroin, crystal methamphetamine - "ice," and marijuana, all controlled substances, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 31

The Grand Jury further charges that:

On or about February 23, 2000, in the District of Hawaii, defendant FELIPE RUIZ-CASTRO and Francisco Mora-Garcia, aka "Pancho," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a distribution of approximately eight ounces of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 32

The Grand Jury further charges that:

On or about February 23, 2000, in the District of Hawaii, defendant FELIPE RUIZ-CASTRO and Sabino Albarran, aka "Pelon," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a distribution of approximately eight ounces of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 33

The Grand Jury further charges that:

On or about February 23, 2000, in the District of Hawaii, the defendant FELIPE RUIZ-CASTRO and Guillermo Alvarez,

aka "Willie," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute a quantity of cocaine, heroin, crystal methamphetamine - "ice," and marijuana, all controlled substances, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 34

The Grand Jury further charges that:

On or about February 24, 2000, in the District of Hawaii, the defendant FELIPE RUIZ-CASTRO and Romeo Antonio Castro-Avalos, aka "Antonio Perez," aka "Tony," aka "Salvadoran," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute a quantity of cocaine, heroin, crystal methamphetamine - "ice," and marijuana, all controlled substances, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 35

The Grand Jury further charges that:

On or about February 24, 2000, in the District of Hawaii and elsewhere, Jose Angel Lemon-Pena, aka "Valerio," aka "Koki," and defendant FELIPE RUIZ-CASTRO used and caused to be

used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute cocaine, heroin, crystal methamphetamine - "ice," and marijuana, all controlled substances, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843 (b) .

COUNT 36

The Grand Jury further charges that:

On or about February 24, 2000, in the District of Hawaii, defendant FELIPE RUIZ-CASTRO and Sabino Albarran, aka "Pelon," did knowingly and intentionally aid and abet each other in the distribution of approximately eight ounces of cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a) (1) and Title 18, United States Code, Section 2.

COUNT 37

The Grand Jury further charges that:

On or about February 24, 2000, in the District of Hawaii, Armando Montano Rodriguez, aka "Camote," aka "Teco," and defendant FELIPE RUIZ-CASTRO used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute a quantity of cocaine, heroin, crystal methamphetamine - "ice," and marijuana, all controlled substances, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 38

The Grand Jury further charges that:

On or about February 24, 2000, in the District of Hawaii and elsewhere, Jose Angel Lemon-Pena, aka "Valerio," aka "Koki," and defendant FELIPE RUIZ-CASTRO used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute a quantity of cocaine, heroin, crystal methamphetamine - "ice," and marijuana, all controlled substances, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 39

The Grand Jury further charges that:

On or about February 26, 2000, in the District of Hawaii, defendant FELIPE RUIZ-CASTRO and Thomas Marino., Sr. used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute a quantity of cocaine, heroin, crystal methamphetamine - "ice," and marijuana, all controlled substances, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 40

The Grand Jury further charges that:

On or about February 28, 2000, in the District of Hawaii, defendant FELIPE RUIZ-CASTRO and Isidro LNU used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a possession with intent to distribute a quantity of crystal methamphetamine - "ice," a Schedule II controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 41

The Grand Jury further charges that:

On or about February 28, 2000, in the District of Hawaii, defendant FELIPE RUIZ-CASTRO and Victor Navarez used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute cocaine, heroin, crystal methamphetamine - "ice," and marijuana, all controlled substances, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 42

The Grand Jury further charges that:

On or about February 28, 2000, in the District of Hawaii, defendant FELIPE RUIZ-CASTRO and Victor Navarez, used and

caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute cocaine, heroin, crystal methamphetamine - "ice," and marijuana, all controlled substances, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 43

The Grand Jury further charges that:

On or about February 28, 2000, in the District of Hawaii, defendant FELIPE RUIZ-CASTRO and Joaquin Aguilar, aka "Negro," aka "Cacharpas," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a distribution of a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 44

The Grand Jury further charges that:

On or about February 28, 2000, in the District of Hawaii, defendant FELIPE RUIZ-CASTRO and Casey Smythe, aka "K.C.," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute a quantity of cocaine, heroin, crystal methamphetamine - "ice," and marijuana, all controlled

substances, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 45

The Grand Jury further charges that:

On or about February 29, 2000, in the District of Hawaii, the defendant FELIPE RUIZ-CASTRO and Isidro LNU used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute cocaine, heroin, crystal methamphetamine - "ice," and marijuana, all controlled substances, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 46

The Grand Jury further charges that:

On or about February 29, 2000, in the District of Hawaii, defendant FELIPE RUIZ-CASTRO, Francisco Mora-Garcia, aka "Pancho," Adrian Barahona, aka "Cuevas," aka "Covachas," Leopoldo Castro-lopez, aka "Polo," Sabino Albarran, aka "Pelon, and Isidro LNU did knowingly and intentionally aid and abet each other in the possession with intent to distribute a quantity of crystal methamphetamine - "ice," in excess of 50 grams, to wit, approximately 56 grams of crystal methamphetamine - "ice," a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT 47

The Grand Jury further charges that:

On or about March 1, 2000, in the District of Hawaii, defendant FELIPE RUIZ-CASTRO and Miguel Gaytan Perez, aka "Pato," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute cocaine, heroin, crystal methamphetamine - "ice," and marijuana, all controlled substances, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 48

The Grand Jury further charges that:

On or about March 2, 2000, in the District of Hawaii, Salvador Castillo, aka "Chava," and defendant FELIPE RUIZ-CASTRO used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute a quantity of cocaine, heroin, crystal methamphetamine - "ice," and marijuana, all controlled substances, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 49

The Grand Jury further charges that:

On or about March 2, 2000, in the District of Hawaii, Salvador Castillo, aka "Chava," and defendant FELIPE RUIZ-CASTRO used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute a quantity of cocaine, heroin, crystal methamphetamine - "ice," and marijuana, all controlled substances, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 50

The Grand Jury further charges that:

On or about March 7, 2000, in the District of Hawaii, Mona Hiiaca Huihui, aka "Jiaca," Miguel Gaytan Perez, aka "Pato," and defendant FELIPE RUIZ-CASTRO used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute cocaine, heroin, crystal methamphetamine - "ice," and marijuana, all controlled substances, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 51

The Grand Jury further charges that:

On or about March 7, 2000, in the District of Hawaii, Holmar Hernandez, aka "Omar," and defendant FELIPE RUIZ-CASTRO used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute a quantity of cocaine, heroin, crystal methamphetamine - "ice," and marijuana, all controlled substances, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 52

The Grand Jury further charges that:

On or about March 7, 2000, in the District of Hawaii, defendants RANDALL RAMELB, aka "Randy," and FELIPE RUIZ-CASTRO used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute cocaine, heroin, crystal methamphetamine - "ice," and marijuana, all controlled substances, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 53

The Grand Jury further charges that:

On or about March 7, 2000, in the District of Hawaii, defendant FELIPE RUIZ-CASTRO and Thomas Marino, Sr. used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute a quantity of cocaine, heroin, crystal methamphetamine - "ice," and marijuana, all controlled substances, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 54

The Grand Jury further charges that:

On or about March 7, 2000, in the District of Hawaii, Leopoldo Castro-Lopez, aka "Polo," and defendant FELIPE RUIZ-CASTRO used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute a quantity of cocaine, heroin, crystal methamphetamine - "ice," and marijuana, all controlled substances, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 55

The Grand Jury further charges that:

On or about March 10, 2000, in the District of Hawaii, defendant FELIPE RUIZ-CASTRO and Mona Hiiaca Huihui, aka "Jiaca," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute cocaine, heroin, crystal methamphetamine - "ice," and marijuana, all controlled substances, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 56

The Grand Jury further charges that:

On or about March 12, 2000, in the District of Hawaii, Robert Mahoney and defendant FELIPE RUIZ-CASTRO used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute a quantity of cocaine, heroin, crystal methamphetamine - "ice," and marijuana, all controlled substances, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).